



**Surfrider
Foundation®**

San Luis Bay Chapter

October 6, 2006

Ryan Lodge
Central Coast Regional Water Quality Control Board
895 Aero Vista Place, Suite 101
San Luis Obispo, CA 93401
Via electronic mail

Re: San Luis Obispo Storm Water Management Program

Thank you for the opportunity to submit comments on the San Luis Obispo County Storm Water Management Program (SLOSWMP) on behalf of the members of the San Luis Bay Chapter of the Surfrider Foundation. The Surfrider Foundation is a non-profit environmental organization dedicated to the protection and enjoyment of the world's waves, oceans and beaches for all people, through conservation, activism, research and education.

San Luis Obispo County has 100 miles of coastline to offer the public for recreational uses. The coastline drives our economy in many important ways. We attract a wide variety of ocean enthusiasts. Surfers from around the world are attracted to our shores.

Coastal Cleanup Day 2006, found 1521 volunteers covering 76 miles of San Luis Obispo coastline. Over 6000 pounds of garbage and recycling was collected in and around near shore waters.

San Luis Obispo County cannot afford to take a lax approach to storm water management. The health of the ocean and those who recreate in and around it depend on good water quality.

The San Luis Bay Chapter feels there is room for improvement in the San Luis Obispo County Storm Water Management Program. The main purpose of the SWMP is to reduce storm water pollution and subsequently improve existing water quality of receiving waters within the permit coverage boundaries. While the County's SWMP cites the importance of water quality monitoring as a measurement tool it fails to institute water quality monitoring into the Program.

The County of San Luis Obispo has identified ocean water quality as a concern. The County, similar to other communities, is struggling with quality of its near shore marine waters including, but not limited to, elevated bacteria concentrations. The County's near shore water quality monitoring program has identified numerous instances of bacterial contamination ultimately leading to public health advisories and/or beach closures. In addition, recent studies have shown a direct correlation between the quality of ocean waters and the recent decline in sea otter populations.

Although water quality monitoring is not a requirement of the General Permit, such a program would serve the following objectives:

- To evaluate compliance with the County of San Luis Obispo Municipal Storm Water Permit;
- To measure and improve the effectiveness of implemented BMPs;
- To assess the chemical, physical, and biological impacts of receiving waters resulting from urban runoff including identification of long term trends;
- To characterize storm water discharges;
- To identify sources of pollutants; and
- To develop a baseline of water quality while continually assessing the overall health of receiving water bodies.

Scientific evidence has linked the quality of storm water runoff with high levels of bacteria in creeks and ocean water. The result is an increased health risk to humans. Implementation of a County water quality monitoring program that evaluates creek and ocean waters will enable the County to adequately investigate concerns of water quality such as bacterial contamination. Furthermore, this data will provide for a focused and effective education campaign.

By adding monitoring requirements to the County SWMP our communities have a baseline for measuring future storm water pollution. Case studies demonstrate that enforcement, or more broadly, accountability is a key element to improving water quality. Routine monitoring and inspection, periodic audits, clear standards of performance, as well as strong incentives and disincentives to address storm water are all effective ways to promote accountability.

We request a public hearing on this matter.

Your consideration of our comments is greatly appreciated.

Matthew Fleming
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